

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case: 2:22-cr-20003
Judge: Michelson, Laurie J.
MJ: Patti, Anthony P.
Filed: 01-04-2022 At 11:32 AM
INDI USA V FREDRICK HAYNES ET AL 2 DFTS (SS)

Violations: 21 U.S.C. § 846
21 U.S.C. § 841(a)(1)
18 U.S.C. § 922(g)(1)

D-1 FREDRIC HAYNES,
a/k/a "Cali,"

D-2 JEREMY JOSHUA.

Defendants.

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE:

21 U.S.C. § 846

Conspiracy to Distribute Controlled Substances

D-1 FREDRIC HAYNES
a/k/a "Cali,"

D-2 JEREMY JOSHUA

From in or about March 2020 and continuing through at least December 20, 2021, within the Eastern District of Michigan, Southern Division, and elsewhere, defendants, FREDRIC HAYNES, a/k/a "Cali," and JEREMY JOSHUA, knowingly and intentionally conspired and agreed with each other and with others, both known and unknown to the Grand Jury, to possess with intent to distribute and to distribute

400 grams or more of a mixture and substance containing a detectable amount of N-phenenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 846, 841(b)(1)(A).

COUNT TWO:
21 U.S.C. § 841
Possession with Intent to Distribute Controlled Substances
18 U.S.C. § 2
Aiding and Abetting

D-1 FREDRIC HAYNES
a/k/a "Cali,"
D-2 JEREMY JOSHUA

That on or about December 10, 2020, within the Eastern District of Michigan, Southern Division, defendants FREDRIC HAYNES, a/k/a "Cali," and JEREMY JOSHUA, knowingly and intentionally possessed with intent to distribute, and aided and abetted each other in possessing with intent to 400 grams or more of a mixture and substance containing a detectable amount of N-phenenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, a Schedule II Controlled Substance in violation of Title 21, United States Code, Section 841(b)(1)(A) and Title 18, United States Code, Section 2.

COUNT THREE:
21 U.S.C. § 841
Possession with Intent to Distribute Controlled Substances
18 U.S.C. § 2
Aiding and Abetting

D-1 FREDRIC HAYNES
a/k/a “Cali,”
D-2 JEREMY JOSHUA

That on or about December 19 through December 20, 2021, within the Eastern District of Michigan, Southern Division, defendants FREDRIC HAYNES, a/k/a “Cali,” and JEREMY JOSHUA, knowingly and intentionally possessed with intent to distribute, and aided and abetted each other in possessing with intent to 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, a Schedule II Controlled Substance in violation of Title 21, United States Code, Section 841(b)(1)(A) and Title 18, United States Code, Section 2.

COUNT FOUR:
18 U.S.C. § 922(g)(1)
Felon in Possession of a Firearm

D-2 JEREMY JOSHUA

That on or about December 20, 2021, within the Eastern District of Michigan, Southern Division, defendant, JEREMY JOSHUA, knowing he had been convicted of at least one crime punishable by imprisonment for a term exceeding one year (a felony offense), did knowingly possess a firearm, that had previously traveled in interstate commerce, all in violation of Title 18, United States Code, Section

922(g)(1).

FORFEITURE ALLEGATIONS:
21 U.S.C. § 853; 18 U.S.C. § 924(d); 28 U.S.C. § 2461
Criminal Forfeiture

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

Pursuant to Title 21, United States Code, Section 853, upon conviction of any offense in violation of Title 21 set forth in this Indictment, the convicted defendant(s) shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offenses.

Upon conviction of any offense in violation of Title 18, United States Code, Sections 922 set forth in this Indictment, the convicted defendant(s) shall forfeit to the United States any firearms and ammunition involved in or used in the knowing commission of the offense, pursuant to Title 18, United States Code, Section 924(d) together with Title 28, United States Code, Section 2461(c).

Property subject to forfeiture under Title 21, United States Code, Section 853 and Title 18, United States Code, Section 924(d) together with Title 28, United States Code, Section 2461(c) includes any firearms, ammunition, and United States currency seized.

In addition to the property specifically identified above, the United States intends to seek a forfeiture money judgment against each defendant for the total value of assets obtained by that defendant in connection with the offense(s) of conviction.

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided

without difficulty, the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), independently and as incorporated by Title 28, United States Code, Section 2461(c).

THIS IS A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

Dawn Ison
United States Attorney

s/ Julie A. Beck
Julie A. Beck (P53291)
Chief, Drug Task Force Unit

s/ Andrea Hutting
Andrea Hutting (P68606)
Assistant United States Attorney

Dated: January 4, 2022

United States District Court
Eastern District of Michigan

Criminal Case Co

Case: 2:22-cr-20003
Judge: Michelson, Laurie J.
MJ: Patti, Anthony P.
Filed: 01-04-2022 At 11:32 AM
INDI USA V FREDRICK HAYNES ET AL 2 DFTS (SS)

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to com

| | |
|--|-------------------------------|
| Companion Case Information | Companion Case Number: |
| This may be a companion case based upon LCrR 57.10 (b)(4) ¹ : | Judge Assigned: |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | AUSA's Initials: AH |

Case Title: USA v. Haynes et al

County where offense occurred : Wayne, Macomb & elsewhere

Check One: ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

☐ Indictment/ ☐ Information --- no prior complaint.
☒ Indictment/ ☐ Information --- based upon prior complaint [Case number: 21-mj-30594]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ **Judge:** _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

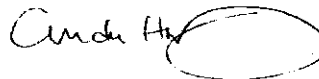
Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

January 4, 2022

Date



Andrea Hutting
Assistant United States Attorney
211 W. Fort Street, Suite 2001
Detroit, MI 48226-3277
Phone: 313-226-9110
Fax: 313-226-3565
E-Mail address: andrea.hutting@usdoj.gov
Attorney Bar #: P68606

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.